

Workforce Investment Act (WIA) Title 1B

Overview

Guide to WIA Eligibility Determination and Documentation ***Guides to Participant Case File Documentation***

Department of Workforce Development
Division of Workforce Solutions
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Background

The Division of Workforce Solutions' (DWS) onsite monitoring of the Workforce Investment Act (WIA) Title 1B Adult, Dislocated Worker and Youth Programs during Program Years 2001, 2002 and 2003 identified deficiencies in participant records in almost every Workforce Development Area. In addition, monitoring of the WIA Title 1B program in Wisconsin by the U.S. Department of Labor found many instances where participant eligibility and activities are inadequately documented. The recently completed data element validation project (Program Years 2002 and 2003) revealed similar deficiencies. Appropriate documentation is required to ensure that WIA funds are used only for eligible participants and that services are provided in accordance with law and policy.

In response, DWS has developed materials to assist Workforce Development Boards (WDBs) and their WIA service providers to document participant information and program services received in a way that satisfies Federal, State and local requirements without placing an undue burden on local program staff. This guide incorporates materials previously made available in other formats (e.g., monitoring guides, the DWS Workforce Programs Guide, analysis of PY02 data element validation, etc.). By bringing these materials together DWS hopes to make this information readily accessible to those that need it most – WDB staff responsible for managing WIA programs and program provider staff responsible for delivering services and working with customers.

DWS has developed three guides for your use. If you already have locally developed guides that meet your needs, you may continue to use them.

The *Guide to WIA Eligibility Determination and Documentation* lists the WIA eligibility criteria and appropriate documentation sources. The *Guides to Participant Case File Documentation* (one each for Adult/Dislocated Worker and Youth programs) outline requirements for documenting participant information and program services. These guides also identify the appropriate documentation to satisfy data element validation requirements.

The Workforce Investment Act distinguishes between general program eligibility and eligibility for services. The *Guide to WIA Eligibility Determination and Documentation* covers general program eligibility including citizenship/authority to work in U.S., Selective Service registration, age, targeted populations, and youth barriers. Eligibility for services is related to local determinations about the client's need for and ability to benefit from services. Documentation requirements for services eligibility are covered in the *Guides to Participant Case File Documentation*.

Guide to WIA Eligibility Determination and Documentation

Eligibility and Registration

All adults and dislocated workers who receive services funded under Title I-B of WIA, other than self-service or informational activities (core services other than staff-assisted core services), must be determined eligible and registered. All youth must be determined eligible and registered in order to receive services funded under Title I-B of WIA.

DWS strongly encourages that necessary participant documentation be obtained prior to providing any WIA services. This may be required by local WDB policies. If this is done consistently, it lessens the risk of providing service to ineligible persons or other violations of WIA requirements that can result in disallowed costs and other sanctions.

Once the application/eligibility process is completed and the documentation required to substantiate the client's eligibility for the program is obtained, and a decision is made to serve the individual, registration in ASSET should be completed and the individual may be enrolled in activities.

There are no federal or state limits on how much time is allowed between the application date and enrollment/registration date, or how much time a local area has to document and verify eligibility. Nevertheless, so much time should not elapse before enrollment/registration that it becomes unreasonable to assume the information about the individual is still true; otherwise, there may be disallowed costs associated with the individual's eligibility. DWS suggests that no more than 45 days elapse between eligibility determination and the start of WIA services to ensure the individual is still eligible.

Individuals who have been determined eligible for multiple WIA programs may be enrolled concurrently. For example, eligible youth who are 18 through 21 years of age may participate in the youth and/or adult program or both, depending on the services needed.

Eligibility Documentation

The *Guide to WIA Eligibility Determination and Documentation* provides a comprehensive list of Title I-B eligibility criteria aligned with recommended documentation sources. A number of definitions are also included. A file copy of any one document listed per eligibility criterion is satisfactory, unless otherwise specified. Local areas may adopt these guides and definitions (in whole or in part) or develop their own tables, policies and procedures for documentation.

It is not possible to anticipate all the differing circumstances that staff may encounter in documenting participant eligibility. If a situation arises that is not covered here or there is a question about acceptable documentation, the Local Program Liaison assigned to your WDA should be contacted for assistance.

In general, documentation should be maintained as hard copy in the participant file. In those instances where documentation cannot or may not be copied, or is not readily obtainable, documents may be inspected or information verified by telephone or in writing. Local areas may develop document verification forms to document eligibility criterion or provide guidance to case managers about what must be included in case notes in a participant's hard copy or electronic

file. A sample **Document Verification Form** for documents that DWD has determined should not be photocopied is included for your use.

Applicant statements may be used when an item is unverifiable or it is unreasonably difficult for the applicant to obtain. A locally developed applicant statement form may be used or guidance provided to case managers about how to take acceptable applicant statements. In addition, the ASSET registration form is being updated to include a statement attesting that the information on the registration form is factual and requiring the participant's signature.

Guides to Participant Case File Documentation

Participant Case File Documentation Requirements

DWS staff (the Local Program Liaisons in the Bureau of Workforce Programs) conducts annual onsite monitoring of the WIA programs administered by the WDBs. A part of this review includes the examination of a sample of participant records, including ASSET screens and paper records in case files.

The purpose of this review is to determine compliance with WIA eligibility and service activity requirements. These requirements include those set forth by the WIA statute and regulations, and state policy. In addition, the examination of these records is used to determine whether local program plans, policies and procedures established by the WDB are being implemented as approved.

DWS strongly encourages that necessary participant documentation be obtained prior to providing any WIA services. This may be required by local WDB policies. If this is done consistently, it lessens the risk of providing service to ineligible persons or other violations of WIA requirements that can result in disallowed costs and other sanctions.

It is not possible to anticipate all the differing circumstances that staff may encounter in working with program participants and that relate to case documentation. If a situation arises that is not covered here or there is a question about acceptable documentation, the Local Program Liaison assigned to your WDA should be contacted for assistance.

ASSET

The ASSET system is primarily a vehicle for the collection of participant data for purposes of meeting the reporting and data requirements of the Department of Labor. ASSET does not have the capability to capture, or verify, a lot of the information that is required to document participant eligibility and services activities. For this reason, ASSET screens are only a part of the participant record – the balance is included in the hard copy participant case files maintained by case managers and other program provider staff.

Other Forms and Documents

With the exception of required ASSET screens, the formats of most participant records are determined and designed at the local level. This has been preferred local practice and is acceptable so long as any forms are designed to capture the necessary kinds of information, staff is trained in their use, and the forms are used consistently and for their intended purposes.

The following documentation, as applicable, is required for the WIA participant case file. These are the documents DWS staff reviews during the onsite monitoring.

- ☐ Local application form
- ☐ ASSET screens (at a minimum, the Customer Summary and Case Notes for all programs and the ISS for youth programs)
- ☐ Individual Employment Plan/Individual Service Strategy
- ☐ Assessment information
- ☐ Documentation/verification of information used to determine eligibility (for programs and program activities). Note: See the *Guide to WIA Eligibility Determination and Documentation* for documentation requirements related to eligibility determination.
- ☐ Authorization for Release of Information
- ☐ Participant's Rights and Responsibilities
- ☐ Participant Notification of Complaint and Grievance Procedures
- ☐ Case notes documenting contact with the participant and progress in the program and follow up activities
- ☐ Contracts for employer-based training (OJT, work experience, etc.)
- ☐ Other materials as applicable that support or document participant eligibility or activities, e.g., job search activity records, supportive service referrals, training attendance records, applications for financial aid, etc.

It is permissible, even preferable, to use existing records that might be available from other programs, etc. For example, if another program has conducted assessments for an individual these should be used if valid so that the customer does not experience duplicative assessments.